

LAW OFFICES
WILLIAMS & CONNOLLY^{LLP}*

KATHERINE A. TREFZ
(202) 434-5038
ktrefz@wc.com

680 MAINE AVENUE SW
WASHINGTON, DC 20024
(202) 434-5000
WWW.WC.COM

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

July 29, 2025

Via ECF

Hon. Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
Courtroom 11B
New York, NY 10007-1312

Re: United States v. Anton Peraire-Bueno and James Peraire-Bueno, Case No. 1:24-cr-00293; Consent Motion for Temporary Modification of Conditions of Release

Dear Judge Clarke:

With the consent of Pretrial Services and the government, Defendants James Peraire-Bueno (“James”) and Anton Peraire-Bueno (“Anton”) respectfully request a temporary modification of their conditions of release for the purpose of offramping cryptocurrency wallets in order to pay for legal expenses in this matter. Both James and Anton have as conditions of their release a prohibition on trading cryptocurrency. Dkts. 8, 20. Certain of their unfrozen cryptocurrency assets (unrelated to the alleged trading activity at issue in this case) need to be offramped to United States dollars in order to pay for their continued legal expenses in this case. Accordingly, James and Anton request a temporary modification of the prohibition on cryptocurrency trading to permit them to take all necessary steps, within 14 days from an order allowing this request, to offramp the cryptocurrency held in the particular vault and wallets identified in my July 16, 2025 email to the government and Pretrial Services.¹

Neither the government nor Pretrial Services objects to this requested modification.

Sincerely,

/s/ Katherine Trefz

Katherine Trefz (*pro hac vice*)
Daniel Shanahan (*pro hac vice*)

¹ The Peraire-Buenos can provide the particular vault and wallet addresses if the Court prefers. If so, they request permission to provide those addresses under seal.

WILLIAMS & CONNOLLY^{LLP}
Hon. Jessica G.L. Clarke
July 29, 2025
Page 2

Patrick Looby (*pro hac vice*)
Williams & Connolly LLP
680 Maine Ave., S.W.
Washington, D.C. 20024
Tel: 202-434-5000
ktrefz@wc.com
dshanahan@wc.com
plooby@wc.com

Jonathan P. Bach
Shapiro Arato Bach
1140 Avenue of the Americas
17th Floor
New York, NY 10036
Tel: 212-257-4897
jbach@shairoarato.com

*Attorneys for Defendant
James Peraire-Bueno*

/s/ Daniel N. Marx

Daniel N. Marx
William W. Fick (*pro hac vice*)
Fick & Marx LLP
24 Federal Street, 4th Floor
Boston, MA 02110
Tel: 857-321-8360
dmarx@fickmarx.com
wfick@fickmarx.com

*Attorneys for Defendant
Anton Peraire-Bueno*